

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

LOUD RECORDS, LLC, a Delaware corporation; UMG RECORDINGS, INC., a Delaware corporation; SONY MUSIC ENTERTAINMENT INC., a Delaware corporation; ELEKTRA ENTERTAINMENT GROUP INC., a Delaware corporation; and INTERSCOPE RECORDS, a California general partnership,)	CIVIL ACTION No. 04-30136-MAP
)	
)	
)	The Hon. Michael A. Ponsor
)	
)	
Plaintiffs,)	
)	
v.)	
)	
LEE THURSTON,)	
)	
Defendant.)	

**MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT LEE THURSTON**

Plaintiffs apply for entry of default judgment against Defendant Lee Thurston ("Defendant") pursuant to Rule 55 of the Federal Rules of Civil Procedure and the Local Rules of the District of Massachusetts. This application is based on the Memorandum of Law filed in support of this Motion, the attached declaration of counsel, the pleadings and files in this action, and such additional argument and evidence that may be presented at or before any hearing that the Court may order on this Motion. In particular, Plaintiffs state as follows:

1. The Clerk of this Court has entered the default of Defendant.
2. Defendant has not appeared in this action.
3. Plaintiffs are informed and believe that Defendant is not an infant or incompetent person, or in active military service.

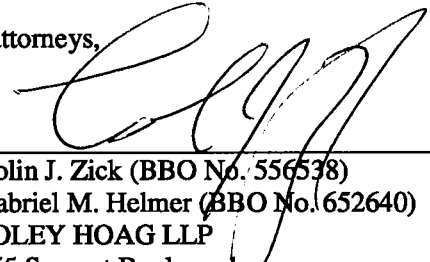
The judgment sought is the minimum statutory damages provided by Section 504 of the Copyright Act (\$750) for each of the infringements alleged in the complaint, injunction pursuant to Section 502 of the Copyright Act, and costs, pursuant to Section 505 of the Copyright Act. Accordingly, Plaintiffs respectfully request that the Court enter default judgment in favor of Plaintiffs and against the Defendant.

LOUD RECORDS, LLC; UMG
RECORDINGS, INC.; SONY MUSIC
ENTERTAINMENT INC.; ELEKTRA
ENTERTAINMENT GROUP INC.; and
INTERSCOPE RECORDS

By their attorneys,

DATED: February 24, 2005

By:



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